

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: WESLEY L BAILEY *dba* P&B LOGGING, LLC *dba* LOG'AN HAUL, LLC
dba MIDSOUTH LOG & PULP LLC *dba* NORTH MS TIMBER HARVESTING, LLC
dba LOGAN BAILEY CONSTRUCTION, LLC
aka LOGAN BAILEY

DEBTOR(S)

CASE NO. 19-10350-JDW

CHAPTER 13

CREDITOR

FORD MOTOR CREDIT COMPANY LLC

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Ford Motor Credit Company LLC (FMCC), by counsel, and for its objection to confirmation of the proposed Chapter 13 Plan says:

1. FMCC holds a secured claim covering a 2014 Ford F-250 vehicle. Debtor proposed to pay FMCC a value of \$15,050.00, plus 2.9% interest.

2. The replacement value of this collateral is \$23,975.00. FMCC should be paid its net balance owed of \$15,946.94, plus the current *Till* rate of 6.75% interest. Further, FMCC should retain its lien until the Debtor receives a discharge.

3. The Chapter 13 Plan does not comply with the provisions of the Bankruptcy Code, the Plan should not be confirmed, and the case should be dismissed.

WHEREFORE, FMCC objects to confirmation as aforesaid and requests that this case be dismissed; and FMCC requests such other relief to which it may be entitled in the premises.

Respectfully submitted,

FORD MOTOR CREDIT COMPANY LLC

by: /s/Olivia Spencer, Its Attorney

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CERTIFICATE OF SERVICE

I, Olivia Spencer, Attorney for Ford Motor Credit Company, LLC, do hereby certify that I have this day caused to be served, via CM/ECF and/or United States Postal Service, a true and correct copy of the above and foregoing "Objection to Confirmation of Plan" to:

Karen B. Schneller, Esq.
karen.schneller@gmail.com
ATTORNEY FOR DEBTOR(S)

Locke D. Barkley
sbeasley@barkley13.com
TRUSTEE

David W. Asbach
USTPRegion05.JA.ECF@usdoj.gov
U.S. TRUSTEE

SO CERTIFIED this the 1st day of March 2019.

/s/Olivia Spencer

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